



LEAD SERVICE LINE INVENTORY GUIDANCE
WA STATE – DWAG 12/5/2022
Office of Drinking Water

Lead Service Line Inventory – EPA’s Lead and Copper Rule (LCRR) Revisions

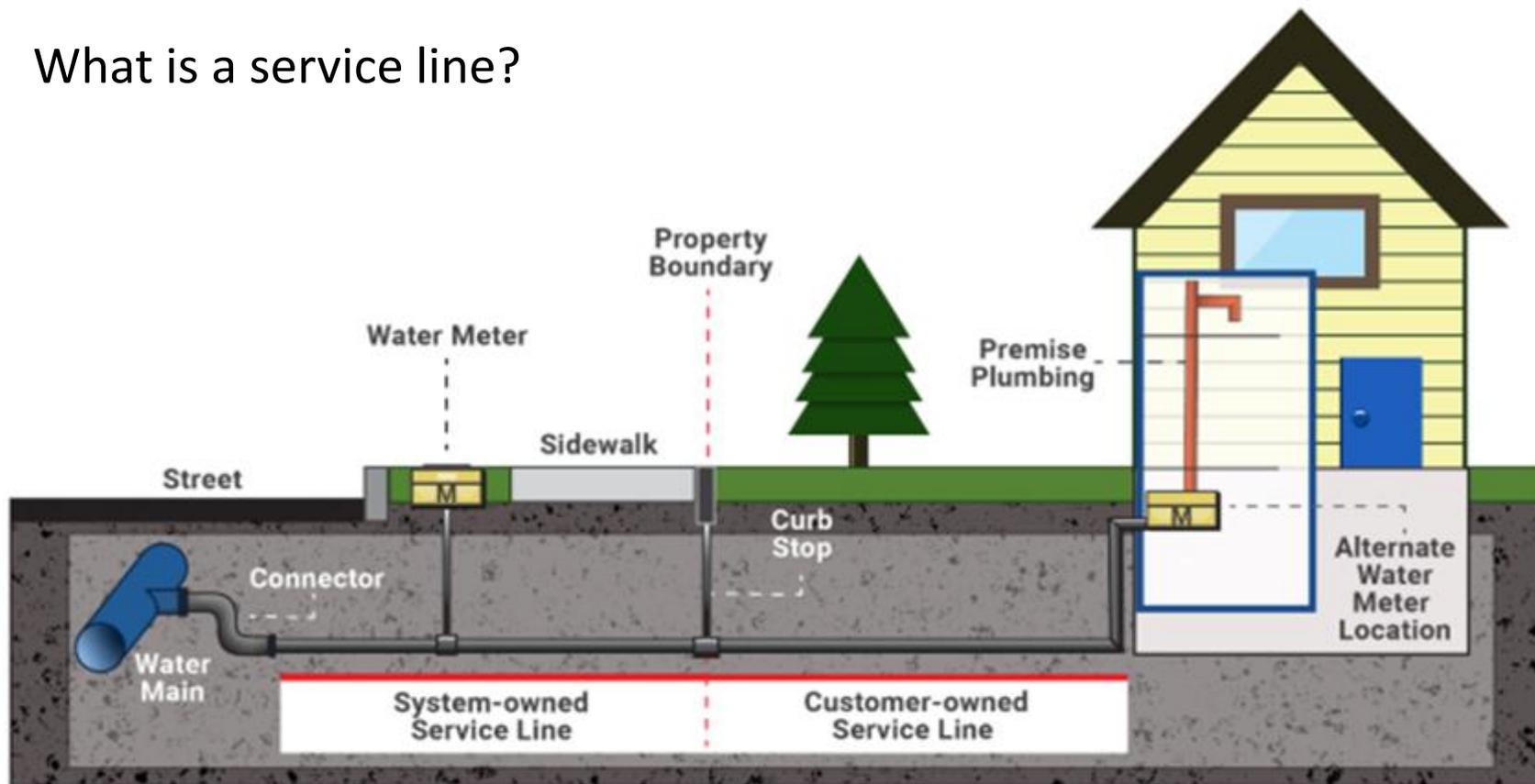
- Only lead survey line inventory requirement will not change.
- All other LCRR subject to change under LCRI (draft summer 2023).
- Community and non-transient non-community Group A water systems.
- Requires record review of information pertaining to service lines.

What do Group A Water Systems Need to Do

- Submit an initial inventory or demonstrate the absence of lead service lines by October 16, 2024.
- Provide public notification within 30 days of initial inventory.
- Any water systems other than 100% non-lead will be updating DOH on progress annually or triennially.

Exhibit 2-2: Example of Service Line Ownership Distinction between the Water System and Customer

What is a service line?



- Utility owned and customer owned lines are to be inventoried.
- Include non-residential services; i.e.: irrigation, fire, and inactive services.

Classification of both Purveyor Owned and Customer Owned portion of every Service Line

Classification Categories

- Lead

- Galvanized Requiring Replacement (GRR)

Galvanized downstream of lead gooseneck or pigtail does NOT meet the definition of GRR

- Non-lead

All portions known NOT to be lead or GRR through an evidenced-based record, method, or technique

- Unknown

Elements Needed for Valid Inventory

- Location identifier – address or unique
- Classification of purveyor-owned portion
- Classification of customer-owned portion
- Basis of classification for each portion

Recommend:

- Presence/absence of lead connector, solder, or gooseneck
- Building type connected to service line

Basis of Classification Categories

- ❑ Historical records
 - Construction and plumbing codes, permits, and existing records or other documentation which indicate the service line materials.
 - Historical records, distribution system maps and drawings, meter installation records, historical capital improvement or master plans, and standard operating procedures.
 - Inspections and records of the distribution system that indicate the material composition of the service connections.
- ❑ Installation date is after state (*1986 or 1988*) or local lead ban (i.e., Pipe Dating)
- ❑ Service line diameter is greater than 4 inches
- ❑ Service line repair or replacement records
- ❑ Field inspection
- ❑ State approval is required for statistical analysis, models, sampling, interpolation, or emerging methods.

What Water Systems Need to Submit to State

- Intake form containing summary of inventory and inventory methods
- Detailed inventory in readable electronic format
- Utilities will need to update their inventories on a regular basis as new inventory information becomes available

Public Notification

- Inventories must be publicly available. Over 50,000 pop, must post the inventories on website.
- Consumer confidence report – Community water systems must indicate how to access service line inventory information.
- Water systems must notify every person served by a lead, galvanized requiring replacement, or lead status unknown within 30 days of completing their inventory.

QUESTIONS and COMMENTS

You may also send questions to
LCRRassistance@doh.wa.gov



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